

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WAYNE BALIGA, derivatively on behalf of  
LINK MOTION INC. (F/K/A NQ MOBILE INC.)

Plaintiff,

-against-

LINK MOTION INC. (F/K/A NQ MOBILE  
INC.), VINCENT WENYONG SHI, JIA LIAN,  
XIAO YU,

Defendants,

-and-

LINK MOTION INC. (F/K/A NQ MOBILE  
INC.),

Nominal Defendant.

Civil Action No.: 1:18-cv-11642

**NOTICE OF MOTION FOR  
INDEMNIFICATION *PENDENTE*  
*LITE***

**PLEASE TAKE NOTICE** that upon the accompanying Declaration of Michael James Maloney, dated October 14, 2020, the exhibits annexed thereto, the accompanying Memorandum of Law, and upon all prior proceedings, pleadings, and filings in this action, Defendant Vincent Wenyong Shi (“Mr. Shi”), by his undersigned counsel, will move this Court, located at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, before the Honorable Debra C. Freeman, United States Magistrate Judge, at a date and time to be determined by the Court, for an Order granting the following relief:

(1) Declaring, pursuant to the Indemnification Agreement for Directors and Officers, effective as of March 10, 2011, by and between Link Motion Inc., f/k/a Netqin Mobile Inc. (the “Company”) and Mr. Shi, that Mr. Shi is entitled to the advancement by the Company of funds for the payment of legal fees and expenses incurred by Mr. Shi in connection with this action;

(2) Directing Robert W. Seiden, the court-appointed receiver for the Company (the “Receiver”), to pay from Company’s funds the amount of U.S.\$208,474.76 for legal fees and expenses incurred by Mr. Shi through September 30, 2020 in connection with this action;

(3) Directing the Receiver to pay upon presentment future invoices for legal fees and expenses incurred by Mr. Shi in connection with this action; and

(4) Granting such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that the time to serve and file papers in opposition to and/or in further support of this motion shall be governed by Local Rule 6.1(b).

Dated: New York, New York  
October 14, 2020

Respectfully submitted,  
  
FELICELLO LAW P.C.

By: /s/ Michael James Maloney  
Michael James Maloney  
Rosanne E. Felicello  
1140 Avenue of the Americas  
9th Floor  
New York, NY 10036  
Tel. 212-584-7806

*Attorneys for Defendant Vincent Wenyong Shi*